REMARKS

Claims 1-34 are pending in the application and stand rejected. Claims 1, 10, 13, 26, 28 and 32 have been amended and claims 9 and 25 have been canceled without prejudice. The Examiner's reconsideration of the claim rejections is respectfully requested based on the above amendments and following remarks.

Claim Rejections – 35 U.S.C. § 103

Claims 1-12 and 33-34 stand rejected as being unpatentable over Vxml in view of Dodrill, as set forth on pages 2-5 of the Office Action. Applicants respectfully submit that at the very minimum, the combination of Vxml and Dodrill is legally deficient to establish a *prima facie* case of obviousness against claims 1 and 33.

More specifically, with respect to claim 1, it is submitted that the combination of Vxml and Dodrill does not disclose or suggest the use of *re-entrant dialog objects within a VoiceXML framework*. In particular, the combination of Vxml and Dodrill does not disclose or suggest *creating a re-entrant reusable VoiceXML dialog component that allow reusable VoiceXML dialog components to be one of initiated, interrupted, inspected, or resumed with a partially filled result object or state object*, as essentially recited in claim 1.

Examiner contends that Vxml teaches re-entrant objects in sections Abstract and 6.2.2. However, it is respectfully submitted that Examiner's characterization of the teaching of Vxml in this regard is misplaced as it is well-known to those of ordinary skill in the art the VXML 1.0 specification does not support re-entrant execution. Indeed, the Vxml Abstract mentions "mixed initiative conversations", but does not disclose or suggest re-entrant dialog components. Moreover, section 6.2.2 <initial> control item does not disclose or suggest re-entrant dialog

8

components. It is well-known that VoiceXML enables mixed initiative <u>only within a document</u> and relies on the "scope" of active grammars to decide the form item activated by a given user input, but such mechanism does not provide for mixed initiative <u>across documents</u>. The invocation of a subdialog limits the scope of active grammars to the subdialog only. Moreover, it is known that VoiceXML 1.0 does not provide a mechanism for exiting form items that have their own execution flow before completion of the dialog flow (see, applicants' specification page 51, et. seq., Section 5 of <u>Vxml</u> regarding execution model).

Therefore, claim 1 is believed to be patentable over the combination of Vxml and Dodrill. Moreover, claim 2-8 and 20-12 are patentable over such combination at least by virtue of their dependence from claim 1.

Furthermore, with respect to claim 33, it is respectfully submitted that the combination of <u>Vxml</u> and <u>Dodrill</u> does not disclose or suggest a server-side speech application server comprising, inter alia, *a database of server-side reusable VoiceXML dialog components that are used by a page generation engine for generating an intermediate VoiceXML page.* Examiner relies on Dodrill (Col. 9, lines 1-5) as disclosing this feature (see page 5 of the Office Action). However, such reliance on Col. 9, lines 1-5 in this regard is respectfully misplaced. The cited section merely discloses that an application server (66) can issue function calls to prescribed services such as IMAP. This disclosure is not remotely related to building an intermediate VoiceXML page from server-side reusable components. In fact, Applicants find nothing in <u>Dodrill</u> that discloses such features. Examiner's reliance on <u>Dodrill</u> appears to be misplaced and irrelevant to the claimed invention.

Moreover, claim 34 is at least patentable over the combination of <u>Vxml</u> and <u>Dodrill</u> at

9

least by virtue of its dependence from claim 33.

Claims 13-32 stand rejected under 35 U.S.C. § 103 as being unpatentable over Vxml in view of Sorsa, for the reasons set forth on pages 5-10 of the Office Action. Applicants respectfully submit that at the very minimum, the combination of Vxml and Sorsa is legally deficient to establish a *prima facie* case of obviousness against claims 13, 28 and 32.

More specifically, with respect to claim 13, for the reasons explained above, Vxml does not disclose *reusable VoiceXML dialog components comprise one or more re-entrant reusable VoiceXML dialog component that allow reusable VoiceXML dialog components to be one of initiated, interrupted, inspected, or resumed with a partially filled result object or state object*, as recited in claim 13. Nor does Sorsa cure the deficiencies of Vxml in this regard.

Therefore, claim 13 is believed to be patentable over the combination of Vxml and Sorsa. Moreover, claims 14-27 are patentable over such combination at least by virtue of their dependence from claim 13.

Furthermore, with respect to claims 28 and 32, the combination of Vxml and Sorsa does not disclose or suggest *dynamically compiling a grammar for the invoked reusable VoiceXML dialog component*, as recited in claims 28 and 32. On page 4 of the Office Action, the Examiner appears to rely on section 14.1.2 of Vxml as discloses dynamic compilation of grammars. However, it is well-known in the art that VoiceXML 1.0 does not support dynamic grammar generation and, consequently, there is nothing in Vxml that discloses or suggests this feature (see, e.g., Applicants' specification, page 51).

Accordingly, claims 28 and 32 are believed to be patentable over the combination of

10

Vxml and <u>Sorsa</u>. Moreover, claims 29-31 are believed to be patentable over the combination of Vxml and <u>Sorsa</u> at least by virtue of their dependence from claim 28.

Accordingly, withdrawal of the claim rejections under 35 U.S.C. § 103 is respectfully requested.

Respectfully submitted,
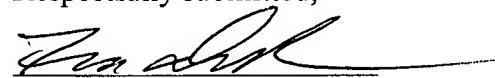
Frank V. DeRosa
Reg. No. 43,584
Attorney for Applicants

F. CHAU & ASSOCIATES, LLC
130 Woodbury Road
Woodbury, New York 11797
Tel: (516) 692-8888
Fax: (516) 692-8889